

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC STIPULATION OF DISMISSAL WITHOUT PREJUDICE
This document relates to the cases listed on the Exhibit attached hereto.	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ Scott Fraser
Scott Fraser
scott@mcdonaldworley.com
MCDONALD WORLEY PC
1770 St. James Pl.
Houston, TX 77056
P: 713.523.5500
F: 713.523.5501

ATTORNEY FOR PLAINTIFFS

s/ Richard B. North, Jr.
Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Scott Fraser
Scott Fraser

EXHIBIT "A"

Member Case Number	Full Name of Plaintiff	Date Answer Filed (If applicable)
2:19-cv-03210	Lynette Thaxton	9/19/2019
2:19-cv-03409	Diorene Thomas	9/19/2019
2:19-cv-04140	Cynthia Thompson	9/19/2019
2:19-cv-04141	Dominique Thompson	9/19/2019
2:19-cv-03782	Joseph Trammell	9/19/2019
2:19-cv-04143	Jessica Trout	9/20/2019
2:19-cv-04228	Estil Tuimminello	9/19/2019
2:19-cv-04236	Neil Uhlhorn	9/13/2019
2:19-cv-04150	Daniel Vasquez	9/19/2019
2:19-cv-01603	Seren Verret	4/18/2019
2:19-cv-03766	Jacqueline Volny	9/19/2019
2:19-cv-03042	Carol Wadhwani	6/5/2019
2:19-cv-03044	Sarah Watkins	9/19/2019
2:19-cv-03779	Garry Weatherford	9/20/2019
2:19-cv-04151	Prentice Worley	9/20/2019
2:19-cv-02394	Amy Wrench	9/20/2019
2:19-cv-01602-PHX-DGC	Nicole Zanelotti	4/18/2019
2:19-cv-03043-DGC	Carolyn Warren	9/19/2019